

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

Rev. ANNE ARMSTRONG)
v)
GINA RAIMONDO et al)

MOTION FOR PROMPT CLARIFICATION OF DEC 10, 2020 MOTION RULING

1. Comes now the Plaintiff with a motion to clarify. A new serious dispute has arisen from the Parties' differing interpretation of the Hon Court's reasoning in the Dec 10, 202 hearing, such that, without clarification, one or both Parties are certain to significantly worsen tortious or otherwise unlawful activity, as a direct result of an ambiguity in the recent Dec 10, 2020 ruling. Clarificational relief for both Parties' sake is eagerly sought.
2. Immediately after the Dec 10, 2020 preliminary injunction hearing in this case, **Plaintiff received 3 written invitations to pray at the Statehouse, from legislators** who work there, in furtherance of the State Directive that the Statehouse is closed to members of the public, but that Statehouse employees, journalists, and **other invited guests are welcome**.
3. Despite the legislators' invitations, the State's position is that the *class of profession*, or the purpose of the visit is how a determination is made of whether or not they are members of the public, or, conversely, if they are on "official business" by virtue of the invitation.
4. The Plaintiff position is that the Hon. Court's ruling was that those meeting the criteria of the Statehouse shutdown exceptions may enter, and that the criteria for "other invited guests" and/or "official business" have been sufficiently met to render her visit not as a "member of the public," but as an "other invited guest" or "other official business".
5. THE PLAINTIFF IS AWARE THAT NO NEW ORDER WILL BE ISSUED TODAY, and instead seeks clarification of the reasoning behind the Dec 10, 2020 hearing. The reasoning provided will settle the new dispute instantly, but, without it, neither party can tell how to decrease their efforts down the wrong path – and one is surely on the wrong path.

Humbly submitted

Rev. Anne Armstrong

/Rev. Anne Armstrong/
(signature)

Dec 11, 2020
Feast of Pope St. Damasius I
"St Pope Damasius, pray for us!"